

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Crown Cork & Seal Company Inc. Master Retirement Trust, <i>et al.</i>, Plaintiffs, v. Credit Suisse First Boston Corp, <i>et al.</i>, Defendants.	Case No. 1:12-cv-05803-JLG Judge James L. Graham
State of Arizona, <i>et al.</i>, Plaintiffs, v. Credit Suisse First Boston Corp, <i>et al.</i>, Defendants.	Case No. 1:12-cv-05804-JLG Judge James L. Graham
City of Chandler, <i>et al.</i>, Plaintiffs, v. Bank One, N.A., <i>et al.</i>, Defendants.	Case No. 1:12-cv-05805-JLG Judge James L. Graham
Lloyd's TSB Bank PLC, Plaintiffs, v. Bank One, N.A., <i>et al.</i>, Defendants.	Case No. 1:12-cv-07263-JLG Judge James L. Graham
Metropolitan Life Insurance Co., <i>et al.</i>, Plaintiffs, v. Bank One, N.A., <i>et al.</i>, Defendants.	Case No. 1:12-cv-07264-JLG Judge James L. Graham

VERIFIED MOTION TO WITHDRAW AS
COUNSEL FOR DEFENDANT LANCE POULSEN

John E. Haller and the firm of SHUMAKER, LOOP & KENDRICK, LLP (“Shumaker”), pursuant to Local Civil Rule 1.4, move the Court for permission to withdraw as counsel for Defendant Lance Poulsen (“Poulsen”) in these actions. This Motion is based on the following grounds:

1. In support of this Motion, Mr. Poulsen’s Affidavit is attached as **Exhibit A**.
2. Mr. Poulsen has requested that Mr. Haller and Shumaker withdraw from representing him in this matter and that he be allowed to proceed *pro se* in this matter due to the fact that Mr. Poulsen’s cannot afford to pay the fees and expenses that he anticipates will be incurred during a jury trial that is currently estimated to last for at two months or more.
3. Mr. Poulsen was provided with a copy of this Motion on December 17, 2012.
4. Mr. Poulsen has been fully informed of his obligations under the Court’s Pre-Trial Scheduling Order (docket 89) and agrees to comply with it and other orders that will be issued by the Court in this matter.
5. As stated in his Affidavit, *Exhibit A*, Mr. Poulsen further understands that this matter will proceed to trial beginning on April 1, 2013, and he agrees that he will not use nor will he be permitted to use the withdrawal of Mr. Haller and Shumaker as a ground for a continuance of the trial or the extension of any of the deadlines set forth in the Court’s Pre-Trial Scheduling Order (docket 89).

6. Mr. Poulsen has also been fully informed that due to his current incarceration, his appearance at trial is not guaranteed, and it will be his sole responsibility and obligation to file the appropriate motions or writs to effectuate his appearance at trial.

7. In the event that Mr. Haller and Shumaker are permitted to withdraw as Mr. Poulsen's counsel in this matter, all future filings by the parties should be served on Mr. Poulsen by mail at the following address:

Lance K. Poulsen
Register #34193-018
F.C.I. Williamsburg
Inmate Mail
P.O. Box 340
Salters, SC 29590

8. Mr. Haller and Shumaker are not asserting a retaining or charging lien.

9. Accordingly, Mr. Haller and Shumaker respectfully request that the Court grant them permission to withdraw as counsel for Mr. Poulsen in this matter. A proposed order granting this Motion has been submitted with this Motion.

/s/ John E. Haller

John E. Haller (*pro hac vice*)

jhaller@slk-law.com

SHUMAKER LOOP & KENDRICK LLP

41 South High Street, Suite 2400

Columbus, OH 43215

Tel: 614.628.4430

Fax: 614.643.1108

VERIFICATION

I declare under penalty of perjury that the foregoing is true and correct. This Verification was executed on December 21, 2012.

/s/ John E. Haller

John E. Haller

CERTIFICATE OF SERVICE

I certify that the foregoing document was served on December 21, 2012 on all parties by electronic delivery through the Court's ECF document filing system and by U.S. mail, postal express, on Mr. Poulsen at the following address:

Lance K. Poulsen
Register #34193-018
F.C.I. Williamsburg
Inmate Mail
P.O. Box 340
Salters, SC 29590

/s/ John E. Haller

John E. Haller

SLK_COL: #232484v1

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

LLOYDS TSB BANK PLC, et., al.,

Plaintiff(s)

vs.

BANK ONE, N.A. et, al.,

Defendant(s).

CASE No CV03-2784
Related:12-07263-JLG
12-07264-JLG

In Re: Affidavit of LANCE POULSEN

LANCE POULSEN #34193-018
F.C.I. WILLIAMSBURG
P.O.Box 340
Inmate Mails
Salters, South Carolina
29590

LLYODS TSB BANK ONE PLC
C/O BRIAN L. CODIN
Sarah Gibbs Leivick
KASOWITZ, BENSON, TORRES
& FRIEDMAN, LLP
1633 Broadway
New York, New York
10019

Defendant(s)/Affiant

Plaintiff(s)

State of South Carolina)
County of Williamsburg) SS: Affidavit of Lance Poulsen

Lance K. Poulsen, being duly sworn, deposes and says:

1. I have requested John E. Haller and the firm of Shumaker, Loop & Kendrick, LLP ("Shumaker") to withdraw from representing me in the above-entitled matter.

2. I wish to represent myself pro se in this matter. This is due in part to the fact that I am subject to restitution order of the United States District Court for the Southern District of Ohio in excess of \$2 billion dollars and cannot afford to pay the legal fees and expenses of a jury trial that I have been informed will last two or more months in New York City, NY.

3. Mr. Haller has fully informed me of my obligations under the Courts Pre-Trial Scheduling Order and I agree to comply with this scheduling order and all other orders that will be issued by the Court in this matter.

4. I understand that this matter will proceed to a trial by jury beginning on April 1, 2013, and that I will not be permitted to use the withdrawal of Mr. Haller and Shumaker as a ground for a continuance of the trial or the extension of any of the deadlines set forth in the Court's Pre-Trial Scheduling Order.

5. I further understand that due to my current incarceration, my appearance at trial is not certain, and it will be my sole responsibility and obligation to file the appropriate motions or writs to effectuate my appearance at trial.

6. In the event that Mr. Haller and Shumaker are permitted to withdraw as my counsel in this matter, I agree to accept all future filings by the parties in this case by mail at the following address:

LANCE K. POULSEN
Register No.:# 34193-018
F.C.I. WILLIAMSBURG
P.O.Box 340
Inmate Mails
Salters, South Carolina
29590

Sworn to under penalty of perjury on this 17 day
of DEC., 2012.

Further Affiant Sayeth Naught


Lance K. Poulsen

State of South Carolina)
County of Williamsburg) SS:
_____)

Subscribed and sworn to before me on this _____ day of
December, 2012.

NOTARY PUBLIC

SEAL:

My commission expires on: